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Attorney for GMW Fire Protection, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

	)	
THE UNITED STATES for the use of	)	
GMW Fire Protection, Inc.,	)	
an Alaska Corporation,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
KANAG'IQ CONSTRUCTION CO., INC.,	)	
an Alaska Corporation and	)	
WESTERN SURETY COMPANY, a	)	
South Dakota Corporation,	)	
	)	
Defendant.	)	
<hr/>		) Case No. A-05-0170 CV (TMB)

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

The plaintiff, GMW Fire Protection Inc., wishes that the following questions be asked of the jury:

What is your occupation?

Who is your employer?

What is the principal activity of the company where you work?

In your work do you have management or supervisory responsibilities?

What other occupations have you had?

Have you ever owned your own business?

Have you ever had a disgruntled employee try to get back at for something?

Did you ever have to fire an employee?

Are you married? Do you have children?

Have you or any members of your family ever filed a lawsuit?

Who filed it?

What was it about?

How was it resolved?

What were your feelings about the process and the resolution?

Have you or any members of your family or close friends ever been sued?

Who filed the lawsuit?

What was it about?

What were your feelings about the process and the resolution?

How was it resolved?

Have you ever testified in a trial or given a deposition?

Have you ever retained an attorney?

Were you satisfied with the services you received?

Do you know any of the lawyers in this case?

What magazines do you enjoy reading?

Before you came today did you know anyone on this jury panel?

Are you familiar with anyone who works for GMW Fire Protection, Inc.?

Or the following employees of GMW?

Glenn Johnson

Gretchen Grau

Clayton Johnson

Jim Luke

Ward Thomas

Marvin Berg

Are you familiar with any of these witnesses?

Thomas Johnson  
Dwayne Bertholl  
Barry Steinkrueger  
Jamie Thurman  
Dave Beck

Are you familiar with any of the employees of the government?

Steve Frere  
Becky Rhodes  
Lucy Teitzel  
Michelle Jones

Are you familiar with anyone who works for Kanag'Iq Construction, Inc.?

Or the following employees of Kanag'Iq?

Bill Jury  
Phil Young  
Judy Foland (formerly Julie Jury)  
Ray Hamilton  
Chieko Jury

This is a dispute between a contractor and a subcontractor on a construction project at Elmendorf Air Force Base. Have you heard of similar cases? Have you formed any opinions about such cases? Is so, what is your opinion?

Have you had any experience with contractors or subcontractors?

What?

Have you ever been a party to a construction contract?

How was the experience?

Another type of contract?

What was that experience like?  
were there any problems?  
How were they resolved?

Have you ever had someone fail to pay you for work you had done?

Did you do anything about it?  
What was the result?

Respectfully submitted this 2nd day of January, 2008.

s/ Sarah J. Tugman  
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CERTIFICATE OF SERVICE

I hereby certify that on the 2<sup>nd</sup> of January, 2008, a copy of the foregoing document was served electronically on Tom Gingras, attorney for Kanag'Iq Construction, Inc.

s/Sarah J. Tugman  
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